

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#

DATE FILED: 7-6-21

----- X
UNITED STATES OF AMERICA :

- v. - :

Michael Castillo, :
a/k/a "Squirrel," :

Defendant. :
----- X

3500 PROTECTIVE ORDER

S2 19 Cr. 428 (JGK)

Upon the application of the United States of America, Audrey Strauss, United States Attorney for the Southern District of New York, by and through Jacqueline Kelly, Jamie Bagliebter, and Peter Davis, Assistant United States Attorneys, of counsel, for an order precluding the dissemination of material produced pursuant to 18 U.S.C. § 3500 and/or *Giglio v. United States*, 405 U.S. 150 (1972) ("3500 Material"), and providing additional protections to a designated subset of disclosures related to non-testifying witnesses which have been classified as "Attorney's Eyes Only," (the "Attorney's Eyes Only Witness Material"), made on consent of defense counsel, and based on the Court's independent review,

IT IS HEREBY ORDERED that (1) defense counsel must destroy or return to the Government all 3500 Material (and any

copies thereof) at the conclusion of the trial of this matter or when any appeal has become final; (2) the defense and the defendant are precluded from disseminating any of the 3500 Material to anyone beyond the defendant, defense counsel, and any paralegal or staff employed by the defense; (3) that defense counsel, and any paralegal or staff employed by the defense, are precluded from disseminating any of the 3500 Material to the defendant until **July 12, 2021**; and (4) the defendant is precluded from taking or keeping any paper copies of the 3500 Material (except for 3500 Material produced for law enforcement agents) with them into any jail facility, whether before, during, or after trial; except that the defendant may review paper copies of the 3500 Material in the possession of defense counsel or any paralegal or staff employed by the defense, when in the presence of defense counsel or any paralegal or staff employed by the defense.

IT IS FURTHER ORDERED that any 3500 Materials having been clearly designated as "Attorney's Eyes Only Witness Material," including any copies thereof or excerpts therefrom, or any information contained therein, shall not be disclosed to or possessed by the defendant, and may be disclosed only to defense counsel and to any paralegal or staff employed by the defense, unless prior authorization is provided by the Assistant United

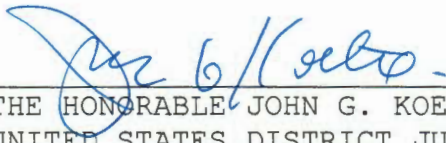
States Attorneys assigned to this matter.

IT IS FURTHER ORDERED that the defendant, defense counsel, and any paralegal or staff employed by the defense are precluded from publicly disclosing or disseminating the identity of any cooperating witnesses, civilian witnesses, or victim witnesses until July 19, 2021.

Dated: New York, New York

~~June~~ 6, 2021

July 6, 2021



THE HONORABLE JOHN G. KOELTL
UNITED STATES DISTRICT JUDGE